

BARROW

Court of Appeals - 41660-3-11

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
FOR DIVISION 2

William Barrow

Petitioner,

vs.

State of Washington

Respondent

Case No.: 10-1-03981-5

STATEMENT OF ADDITIONAL
GROUNDS, PURSUANT TO RAP
10.10

11 AUG 15 AM 9:30
BY STATE OF WASHINGTON
DEPUTY

COURT OF APPEALS
DIVISION II

STATEMENT

I William Barrow

have received and reviewed the opening brief

prepared by my attorney. Summarized below are the additional grounds for

review that are not addressed in that brief. I understand the Court will review this

Statement of Additional Grounds for Review when my appeal is considered on

the merits.

FROM THE BOOK REVISED CODE OF WASHINGTON 2004
OFFENDER SCORING RCW 9.94A.525(11)

ADDITIONAL GROUND 1

IF THE PRESENT CONVICTION IS FOR A FELONY TRAFFIC
OFFENSE COUNT TWO POINTS FOR EACH ADULT OR
JUVENILE ~~ADULT OR~~ PRIOR CONVICTION FOR
VEHICULAR HOMICIDE OR VEHICULAR ASSAULT. FOR
EACH FELONY OFFENSE COUNT ONE POINT FOR EACH ADULT
AND 1/2 POINT FOR EACH JUVENILE PRIOR CONVICTION - FOR
EACH SERIOUS TRAFFIC OFFENSE OTHER THAN THOSE
USED FOR ENHANCEMENT PURSUANT TO ~~RCW~~

RCW 46.61.520(2) COUNT ONE POINT FOR EACH ADULT
FOR EACH ~~ADULT~~ AND 1/2 PRIOR CONVICTION -

JUVENILE
SINCE I MR BARROW ONLY HAVE ONE - FELONY - 1 POINT
STATEMENT OF ADDITIONAL GROUNDS
SEE SERIOUS TRAFFIC - D.U.I MISDEMEANOR SEE ADDITIONAL
GROUND II →

9.94A.525 (2)

PART OF OFFENDER SCORING
COME FROM THE BOOK
REVISED CODE OF WASHINGTON LAWS 2004

Note

CASE 08-1-01042-4

FEBRUARY-1-2008

Failure To Remain At Accident - IN A DEATH

ADDITIONAL GROUND 2

SERIOUS TRAFFIC CONVICTIONS SHALL NOT BE
INCLUDED IN THE OFFENDER SCORE SINCE THE
LAST DATE OF RELEASE FROM CONFINEMENT -
INCLUDING Full Time Residential Treatment to a Felony
CONVICTION if ANY OR ENTRY JUDGMENT AND
SENTENCE THE OFFENDER SPENT FIVE YEARS IN THE
COMMUNITY WITHOUT COMMITTING ANY CRIME THAT
SUBSEQUENTLY RESULTS IN A CONVICTION THIS SUBSECTION
APPLIES TO BOTH ADULT AND JUVENILE PRIOR CONVICTION
SENTENCING REFORM ACT OF 1981 - THERE FOR
AS YOU SEE D.U.I ARE MISDEMEANOR AND CANNOT
BE USED AS POINT AND I MR. BARROW MAKE IT
CLEAR - I WAS MAINTAINING A LAW ABIDING PERSON
UNTIL THE HORRIBLE ACCIDENT FEBRUARY-1-2008
LAST SERIOUS TRAFFIC WAS A.D.U.I OCT. 10-2001
~~THE~~ THERE FOR MISDEMEANOR CANNOT BE USE AS
POINT - THERE FOR MR BARROW HAS ONE POINT FEBRUARY-1-
2008 - PLUS ONE MORE POINT FOR THE CURRENT CHARGE
SEPT-17-2010 - MAKE IT 2 POINT TOTAL FOR MR BARROW

ADDITIONAL GROUND 3

IN ADEQUATE DEFENSE - PRIOR TO THE TRIAL I
MR. BARROW WAS INFORM MY ~~WAS~~ PUBLIC DEFENDER
THAT THE PROSECUTING WAS TALKING HOW MR.
BARROW "KILL" SOMEONE BEFORE AND DID NOT GET
ENOUGH TIME - ACCORDING TO THE SHERIFF DEPARTMENT
MR. BARROW DID NOT "KILL" NO ONE THAT IT WAS
A ACCIDENT WITH A DEATH -
"ACCIDENT" - MEANING NOT PLANNED - NOT INTENDED TO DO
NO HARM TO NO ONE - SO HOW COULD MR. BARROW
GET A FAIR TRIAL - WHEN HE USING PAST CRIME THAT
MR BARROW WAS REMORSE FULL - INSTEAD OF DEALING
WITH THE PRESENT CHARGE -

ADDITIONAL GROUND 4
Adequate Defense - Why the Attorney & I
not give me Adequate Defense - I wrote
my letter Explain "EVERYTHING IN DETAIL"
out Sept. 17-2010 "ACCIDENT" IN THE CHARGEING
PER- Failure To Remain At Injury - SAME TIME
DID STOP AND OBSERVER THE VICTIM - SAME
people was yelling DONOT Touch HIM CALL 911 - SAME
TIME MY DOG got out I notice HOW THE VICTIM WAS
Sitting up TALKING ON HIS PHONE - MY DOG LEASE got
CAUGHT UNDER is Behind - THAT THE TIME I notice HOW
I SWERVE TO AVOID NOT HITTING THE VICTIM
ON THE SIDE WALK AND BLOCKING TRAFFIC I DID
IMMEDIATELY STOP - AFTER I OBSERVER THE VICTIM
Sitting up AND TALKING - when I notice my TRUCK WAS
BLOCKING most of THE Intersection! when I said IM moving
it AND going to get my I.D. ~~when~~ went to my HOUSE BLOCK
1/2 AWAY - while I WAS putting my dog up AND obtain my
I.D. I WAS walking out the DRIVE way when Police
PULL UP - I WAS on my way BACK TO THE SCENE AFTER
STOP PRIOR TO CHARGE PAPER - ABOUT making APPARE
ON IN the NECESSARY "Necessary" treatment - APPARE
ARRANGEMENT FOR VICTIM - ABSOLUTELY REQUIRED - AS A Defense
TREATMENT - BUT NOT ABSOLUTELY REQUIRED - AS A Defense
IS needed - ADDRESS HOW I SWERVE - Notice FROM to my
THIS WAS Police Report LIKE I SAID I WAS going to
IN curve ON the house LIKE I SAID I WAS going to
THAT I DID NOT EVEN BRING OUT THE FR
MY ATTORNEY DID NOT EVEN BRING OUT THE FR
THAT I DID STOP - NONE OF THIS WAS RAIS
IN THE COURT OF CL
IN THE Defense M.R. B

If there are any additional grounds that I believe are necessary for this court to review, which were not adequately briefed by my attorney, a brief summary is attached to this statement.

DATED this 3 day of August, 20011.

William Barrow
(Appellant Signature)

WILLIAM BARROW
(Appellant's Printed Name)

~~Shelton Creek Corrections Center~~
~~191 Commerce Way, Unit #~~
~~Aberdeen, Washington 98520~~

Additional grounds 5 - In the Charging Paper MR BARROW STOP - Apparent treatment is necessary - Enclose you will find copy list of words that was use in the Court of Law's AND THE MEANING OF THEM "All meaning come's FROM THE WORLD BOOK DICTIONARY - FOR TAKING RESPONSIBILITY FOR MY OWN ACTION - ADDITIONAL - YOU WILL FIND ALL OF MR BARROW ADULT CONVICTION AND OR JUVENILE - THEN YOU WILL FIND A OFFENDER SCORING - AS YOU WILL SEE THE DATE'S OF LAST SERIOUS TRAFFIC "D.U.I." THE DATE TO THE HORRIBLE ACCIDENT FEBRUARY-1-2008 SEE ADDITIONAL GROUNDS NUMBER 2 ABOUT SERIOUS TRAFFIC CONVICTIONS - Date - PLEASE NOTE ALSO THAT FEBRUARY-1-2008 - ONE Felony + 1 Sept-17-2010 - one Felony + 1 = 2 Points

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STATEMENT

I, William BARROW, have received and reviewed the opening brief prepared by my attorney. Summarized below are the additional grounds for review that are not addressed in that brief. I understand the Court will review this Statement of Additional Grounds for Review when my appeal is considered on the merits.

with the OFFENDER SCORING RCW 9.94A.525(11)
COME FROM THE BOOK REVISED CODE OF WASHINGTON 2004

ADDITIONAL GROUND #6

THIS GOES WITH GROUND 1 - AND FOR ADDITIONAL GROUNDS 2
9.94A.030 DEFINITION (36) - A - SERIOUS TRAFFIC
CONVICTIONS - GOES WITH THE SENTENCING REFORM
ACT OF 1981 - DRIVING WHILE UNDER THE INFLUENCE OF
INTOXICATING LIQUOR OR ANY DRUGS (RCW 46.61.502) ACTUAL
PHYSICAL CONTROL WHILE UNDER THE INFLUENCE OF
INTOXICATING LIQUOR OR ANY DRUG (RCW 46.61.504) RECKLESS
DRIVING (RCW 46.61.500) OR HIT AND RUN AN ATTENDED VEHICLE
(RCW 46.61.502)(5) THERE THE LAW CANNOT USE
DUII MISDEAMOR AS POINT FOR MR. BARROW
AS SO STATE ON ADDITIONAL GROUND 2 (RCW 9.94A.525)(2)
REGARDING SERIOUS TRAFFIC CONVICTION AS STATE MR.
THEREFORE CANNOT BE USE OFFENDER SCORING - RE BARROW

ADDITIONAL GROUND #7

IN REGARDING "Kill" AND TAKING RESPONSIBILITY
THE REMARK'S FROM THE COURT AND PROSECUTING
ATTORNEY - REFERRING TO MR. BARROW ABOUT A OLD CASE
IN WHICH THE DEFENSE ATTORNEY DID NOT ARGUE OR
BRING UP TRUE FACT - REASON WHY I MR. BARROW RECEIVED
A FAIR TRIAL - THE COURTS, PROSECUTING ATTORNEY, DEFENSE
ATTORNEY ARE BIAS - POINT BLANK WAS NO DEFENSE FOR
MR. BARROW. TO HELP WITH MR. BARROW DEFENSE AND THE
ERROR OF THE COURTS - I MR. BARROW HAS WRITTEN A
STATEMENTS ON NOTE BOOK PAPER (1) (2) TO CLEARUP OLD CASE

MOST IMPORTANT IS "Kill" AND RESPONSIBILITY"
AND IN CONCLUSION - I MR. BARROW IS ASKING THIS
COURT OF APPEAL'S RESENTENCING - AS STATE BY
LAW - IN WHICH INCLUDES THAT MR. BARROW RECEIVED ALL IS
GUIDE FROM THE BOOK REVISED CODE OF WASHINGTON STATE
2004 - WITH SENTENCING REFORM ACT'S - RCW. 9.94.0250

ADDITIONAL GROUND 1 - THEN REGARDING SERIOUS TRAFFIC CONVICTIONS
RCW. 9.94A.025 (2) ADDITIONAL GROUND 2 ADDITIONAL GROUND'S (6)
RCW 9.94A.030 (36)(A) DEFINITION OF WHAT SERIOUS TRAFFIC ARE

I MR. BARROW IS ASKING THE COURT'S - CONSIDER ADDITIONAL GROUND
3, 4, 5 ON THE ERRORS THE DEFENSE ATTORNEY ARGUE OR BRING
UP TRUE FACT'S TO MR. BARROW CASE # 10-1-03981-5

ALSO FEEL FREE TO READ POLICE REPORT'S - IN WHICH THE CHARGING
STATE'S - REGARD DID MR. BARROW IMMEDIATELY STOP?

TO OBTAIN MEDICAL AID'S AS "NECESSARY" IN WHICH MR. BARROW
HAD NO DEFENSE ON THIS ISSUE - TO END I MR. BARROW
FEELS THAT THIS ALL ADDITIONAL GROUND'S 1-2-3-4-5-6-7 IS ALL
RELEVANT TO THIS CASE # 10-1-03981-5 AND I MR. BARROW
HOPE THE COURTS WILL RESOLVE THIS IN A TIMELY MATTER -
THANK YOU

If there are any additional grounds that I believe are necessary for this court to review, which were not adequately briefed by my attorney, a brief summary is attached to this statement.

DATED this 4 day of August, 20011.

William Barrow

(Appellant Signature)

WILLIAM BARROW

(Appellant's Printed Name)

~~Stafford Creek Corrections Center~~

~~191 Conventine Way, Unit #~~

~~Aberdeen, Washington 98520~~

IN CONCLUSION I MR. BARROW FEEL'S
THE ERROR'S OF ~~THE COURT'S~~ ~~THE BARROW~~ Prosecuting
Attorney, Defense Attorney will correct
THE ERROR'S - THANK YOU
I'M MR. BARROW IS A NON-VIOLENT
PERSON